

Slide 1: This presentation is for Industrial Stormwater Permittees who have finished a year of sampling requirements and want to know what to do after the required “year 2” sampling year is over. We are going to cover 5 aspects of what to do when your year 2 of sampling has ended. This presentation will help you understand what you need to do whether you passed, exceeded or couldn’t collect any samples within year 2, what you have to in year 3 and 4, and where to find the tools to help you with next steps.

Slide 2: This presentation lasts about 15 minutes and if you prefer written notes in addition to listening to this presentation, click on the link on the screen.

Slide 3: I will provide an overview of Benchmark Monitoring Requirements, provide information about the data sent to the MPCA so far, what you need to do in “year 3” and beyond.

Slide 4: The next few slides we’ll review some of the basic requirements of benchmark monitoring. There are three additional messages: 1. the benchmark values are NOT limits 2. An exceedance for either a single sample or the yearly average is not a violation. And 3. Not sending in forms or not making changes after a yearly average of exceedances are violations.

Slide 5: For permittees who complete their “year 2” of sampling and their averaged results do not exceed for all parameters at all chosen monitoring locations, the permittee has no more monitoring to conduct for the rest of this general permit, which expires April 2015. If this applies to you, you may stop watching this presentation now. Keep your BMPs in good condition and keep conducting your monthly inspections.

Slide 6: For permittees who were unable to collect a sample in year 2 whether or not Stormwater Monitoring Report forms were submitted, they will have to go through “year 4” sampling requirements.

Slide 7: For those who exceed for their year 2 results, Permittees have “year 3” to make changes and sample again in “year 4.” There are no required “year 3” sampling requirements for benchmark monitoring. For permittees who exceed and discharge either to an impaired water or an “Outstanding Resource Value Water,” these permittees have less time to make changes to their Stormwater Pollution Prevention Plan and to their BMPs before sampling again in “year 4.” Read the permit or review information on the website for more information. Also, if you have multiple parameters and/or multiple monitoring locations, you only have to re-sample in “year 4” for the parameters you had an exceedance for, at the locations you had an exceedance at. You do not have to sample the parameters you passed for the yearly average.

Slide 8: Remember, if you have an exceedance for either a single sample or for the yearly average, it’s not a violation. Benchmark values are action levels, requiring you to take action if you exceed for your yearly averages. But if you didn’t take any samples and did not provide no flow explanations on the SWMRs, or if you exceeded for the year and don’t make changes to your SWPPP or your facility, those are violations.

Slide 9: Let’s take a look at the results submitted so far by all permittees who have submitted benchmark monitoring data.

Slide 10: These results were analyzed early June 2012, and only represent individual samples and not yearly averages. Generally the results are pretty good! A lot of the individual samples do not exceed the benchmark values.

Slide 11: Total Suspended Solids is a pollutant parameter that all permittees must sample for. 64% of the results are below the benchmark values. That's good news! For those who exceed, many of the samples are just over the benchmark value of 100 mg/L (though it's 65 mg/L for those discharging to a non-wetland Outstanding Resource Value Water). The arrow is pointing to a pollutant parameter's benchmark value.

Slide 12: Iron is the second most common pollutant to sample for. As you can see, there is a lot of room for improvement for this pollutant parameter, with 70% of the individual results representing exceedances. And with a benchmark value goal of 1 mg/L, a lot of permittees have a lot of really high exceedances. Hopefully these permittees are making BMP changes.

Slide 13: Aluminum is another common pollutant parameter to sample for. Again, with a benchmark value of 1.5 mg/L, many permittees have exceeded for one or more monitoring interval and many of the exceedances are quite high. As you'll see later, there is a lot of guidance to utilize to consider different BMPs to address these exceedances.

Slide 14: For permittees with Chemical Oxygen Demand requirements, 70% of the sample results are not over the benchmark values. Biological Oxygen Demand or BOD, has similar results, with 82% of the samples not exceeding the benchmark value.

Slide 15: There is room for improvement with zinc; half of the samples are over the benchmark value.

Slide 16: Lead's results are good: 85% of the sample results do not exceed the benchmark value.

Slide 17: So overall the results are good. If permittees with single or yearly average exceedances make improvements for total suspended solid exceedances, they will likely bring down the values of metal exceedances, if they have both to sample for.

Slide 18: Let's take a look at what year 3 means for you. You are not required to conduct benchmark monitoring within year 3. Permittees are welcome to take samples after trying different BMPs and keep the results for their own use, but any results sent to the MPCA during their "year 3" will not count toward any required sampling years' averages.

Slide 19: Visit the Permit Information Access page to see if you are required to monitor in year 4. If you have averaged your own "year 2" results, you probably already know whether or not you passed or exceeded, and whether or not you have to monitor in year 4.

Slide 20: After a year of monitoring, your final Stormwater Monitoring Report Form is due the following month. 6 weeks after that, the Permit Information Access, "Monitoring Calendar" page will be updated to let you know if monitoring is required in year 4 or not. For example, if you received permit coverage June 2010, you finished a year's worth of sampling requirements June 2012. Your final SWMR was due no later than July 21st, 2012. By September 1, 2012, the Monitoring Calendar and necessary SWMRs were updated by the MPCA.

Slide 21: Here's an example facility's "year 2" data. They did not exceed for their year of monitoring.

Slide 22: Here's what that facility's Monitoring Calendar looks like. Year 4 shows that no monitoring is required.

Slide 23: Now let's look at a facility that had an exceedance for one of their benchmark values in year 2.

Slide 24: Their monitoring calendar indicates they have sampling requirements in Year 4. Their SWMRs are populated to help them get ready for Year 4 sampling requirements.

Slide 25: Because they did not exceed for Total Suspended Solids, they do not have to resample for this parameter. They only have to resample within year 4 for Iron.

Slide 26: All permittees who have a yearly exceedance in year 2 should be thinking of different BMPs to implement within year 3 before sampling again in year 4.

Slide 27: First, consider what non-structural BMPs you can modify. Often, the solutions may include non-structural or simple structural BMPs, such as putting scrap metal waste into a dumpster instead of having it on the ground, or starting or increasing street sweeping.

Slide 28: There are some types of BMPs that are a bit more unique in nature and can also help with contaminant/sediment removal.

Slide 29: If non-structural/simple-structural BMPs are not enough, consider structural, costly BMPs last. There are a number of them that work very well at contaminant/sediment removal but may take up a lot of space or cost a lot of money.

Slide 30: We've created a variety of helpful tools that are available to you to help you consider different BMPs.

Slide 31: Take a look at the "Steps to Compliance" section of the Industrial Stormwater Program's website.

Slide 32: Look at Step 7: Sector-specific requirements, guidance. This step provides information about what's required for each sector, and also provides guidance information for every sector.

Slide 33: First, each sector specific chapter of the Industrial Stormwater permit are broken down into separate downloadable documents.

Slide 34: The Environmental Protection Agency has created fact sheets that provide each sector dozens of BMP ideas, broken up by pollutant & contaminant, and by activity & material.

Slide 35: Here's what an example EPA fact sheet looks like.

Slide 36: The fact sheets describe what pollutants are related to which activities or materials.

Slide 37: And the breaks down BMP options by those activities or materials.

Slide 38: In many cases, the MPCA created guidance documents for industry-specific assistance. You'll find that information within this column.

Slide 39: Here's an example of that, a pollution prevention fact sheet for the Timber Products sector.

Slide 40: Finally, the MPCA scouted other states' resources to find information that would be helpful to permittees on a sector-by-sector basis.

Slide 41: Take a look at all parts of the Industrial Stormwater Program website, including the steps to compliance section, for a variety of assistance. The website will provide help when considering different BMPs, information about University of Minnesota workshop opportunities, how to sign up to receive quarterly e-newsletters and more. This PowerPoint presentation is a condensed version of a 4-hour workshop offered through the U of M Erosion and Stormwater Management Certification Program.

Slide 42: Feel free to call the Stormwater Hotline or any of the staff listed within the Industrial Stormwater Program, for any questions about exceedances, sampling questions, or other compliance questions for the Industrial Stormwater Permit.

Slide 43: The Industrial Stormwater Program would like to thank the following people for all of their hard work and contributions to the information provided in these slides.

Slide 44: Thank you for watching this presentation!